Baxter must sample all monitoring wells for all metals which have a national Primary Drinking Water Standard within 30 days of completion of the pilot test, and submit a

While not required, EPA recommends that Baxter analyze groundwater for metals prior to the pilot study to provide a baseline.

report to EPA showing the results within 60 days of sampling.

Please contact me at (206) 553-6702 or at palumbo.jan@epa.gov, or have your legal counsel contact Jennifer MacDonald at (206) 553-8311, if you have any questions.

Jan Palumbo

Project Coordinator

cc: James C. Hanken Wolfstone, Panchot & Bloch

> Douglas Fox Stella-Jones Corp.

J. Stephen Barnett Premier Environmental, Portland

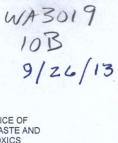
Georgia Baxter J.H. Baxter, San Mateo

Dean Yaxuda Washington State Department of Ecology

> **USEPA RCRA** 3019764

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| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY |
| Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: | A. Signature X Shuri Rhodes B. Received by (Printed Name) SHERI RHOUS C. Date of Delivery 10.3.13 D. Is delivery address different from item 1? If YES, enter delivery address below: |
| RueAnn Thomas Environmental Programs Director J.H. Baxter & Co. 85 N. Baxter Rd. P.O. Box 10797 Eugene, OR 97440 | e Mail |
| 2. Article Number (Transfer from service label) 7012 1010 | 0003 2872 94521 11 |
| PS Form 3811, February 2004 Domestic Ret | urn Receipt 102595-02-M-1540 |
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 10**

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

OFFICE OF AIR, WASTE AND TOXICS

SEP 26 2013

Ms. RueAnn Thomas Environmental Programs Director J.H. Baxter & Co. 85 N. Baxter Road P.O. Box 10797 Eugene, OR 97440-2797

Conditional Approval of Revised Source Area Investigation and Chemical Oxidation Pilot Re:

Test Work Plan (Work Plan)

Former J.H. Baxter & Co. ("Baxter"), Arlington Facility ("Facility")

§ 7003 Administrative Order on Consent ("Order")

Docket No.: RCRA-10-2001-0086 EPA ID No.: WAD 05382 3019

Dear Ms. Thomas:

The U.S. Environmental Protection Agency, Region 10 ("EPA") has reviewed the above referenced Work Plan, dated August 20, 2013. EPA hereby approves the Work Plan conditioned on the following requirement:

Baxter must sample all monitoring wells for all metals which have a national Primary Drinking Water Standard within 30 days of completion of the pilot test, and submit a report to EPA showing the results within 60 days of sampling.

While not required, EPA recommends that Baxter analyze groundwater for metals prior to the pilot study to provide a baseline.

Please contact me at (206) 553-6702 or at palumbo.jan@epa.gov, or have your legal counsel contact Jennifer MacDonald at (206) 553-8311, if you have any questions.

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> Douglas Fox Stella-Jones Corp.

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Georgia Baxter J.H. Baxter, San Mateo

Dean Yaxuda Washington State Department of Ecology



Region 10 Routing and Concurrence

| | thor: Jan Palumbo | | | | Date | 9 | 9/24/13 | | | |
|---|---|------------|---|---|--------|----------|--|---|--------------------|--|
| ressee: | RueAnn Tho | mas | | | | | | | | |
| ect: | Conditional | val of Che | mical Oxidati | on Pilot Test | Work | (Plan | | | | |
| Location/Name: | | | | | | | | | | |
| PROGRAM ADMIN | REVIEW: | | | | | | | | | |
| Name: WEI | WEISS | | 1BO | ORC OE | | 1/ | POLICY YES/NO | | RCRAINFO YES/NO | |
| Initials/Date: | | 9/2 | 24/13 | | 9/2 | 9/24/13 | | | | |
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| Name: | ARRIGONI | | | CASTRILLI | FISHER | Н | EDEEN | BROWN | MEYER | |
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| cc(s) (include name, titl James C Hanken | | | | d email if PDF is | | ch a lis | J Stephen AMEC Env | rironment | | |
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| cc(s) (include name, title James C Hanken Wolfstone, Panch 1111 Third Ave. Seattle WA 9810 Gary Dupuy AMEC Environmer One Union Square 600 University Stre Seattle, WA 9810 | not & Bloch , Suite 1800 11 nt & Infrastructive eet, Suite 600 | cture | Georgia J.H. Ba P.O. Bo San Ma | a Baxter exter & Co. ex 5902 exteo, CA 944 | O2 | | J Stephen AMEC Env 7376 SW I Portland, C Dean Yash Washingto 3190 160th Bellevue, V | ornment Durham R DR 97224 Juda In Departn In Ave SE IVA 98008 | nent of Ecology | |
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